

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,)	
)	No. 17-cv-05806-RJB
Plaintiff,)	
)	
vs.)	
)	
THE GEO GROUP, INC.,)	
)	
Defendant.)	
)	
)	

30(b)(6) DEPOSITION UPON ORAL EXAMINATION OF
COLLEEN MELODY
August 10, 2018
Fircrest, Washington

Taken Before:

Laura A. Gjuka, CCR #2057
Certified Shorthand Reporter

A P P E A R A N C E S

For the Plaintiff:

MARSHA CHIEN
LA ROND BAKER
Assistant Attorney General
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
206-464-7744
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For the Defendant:

JOAN K. MELL
III Branches Law, PLLC
1019 Regents Boulevard
Suite 204
Fircrest, WA 98466
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Also Present:

ANYA PERRET

EXAMINATION INDEXEXAMINATION BY:PAGE NO.

Ms. Mell

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EXHIBIT INDEXEXHIBIT NO.DESCRIPTIONPAGE NO.

Exhibit No. 24

10 pages, Notice of Deposition

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Exhibit No. 25

2 pages, Various Emails, 2014

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1 BE IT REMEMBERED that on the 10th of August,
2 2018, 9:06 a.m., at 1019 Regents Boulevard, Fircrest,
3 Washington, before LAURA A. GJUKA, CCR# 2057, Washington
4 State Certified Court Reporter residing at University
5 Place, authorized to administer oaths and affirmations
6 pursuant to RCW 5.28.010.

7 WHEREUPON the following proceedings were had,
8 to wit:

9 * * * * *

10
11 COLLEEN MELODY, having been first duly sworn by
12 the Court Reporter, was examined and
13 testified as follows:

14
15 EXAMINATION

16 BY MS. MELL:

17 Q State your name for the record.

18 A Colleen Melody.

19 Q What's your address?

20 A My business address is 800 Fifth Avenue, suite 2000,
21 Seattle, Washington 98104.

22 Q Okay. What's your personal address?

23 MS. CHIEN: Objection. Is there a reason
24 you need her personal address?

25 MS. MELL: Not if you're going to accept

1 service if I need to --

2 THE WITNESS: Yes, we accept service
3 through our --

4 MS. CHIEN: Through the business address.

5 BY MS. MELL:

6 Q When you say "we accept service," if you're not there
7 and I need to subpoena you, the Attorney General's
8 office will accept service for you?

9 A Yeah.

10 MS. CHIEN: Yes.

11 BY MS. MELL:

12 Q Okay. And your phone number?

13 A (206) 464-5342.

14 Q And that's work?

15 A That's my direct line at work.

16 Q What is your position?

17 A I'm a unit chief for the civil rights unit at the
18 Washington State Attorney General's Office.

19 Q How many people are in the civil rights unit?

20 A Thirteen.

21 Q And who are those people comprised of? I don't need to
22 know their names, I just need to know what they do.

23 A They're attorneys and support staff that include
24 investigator, paralegal, legal assistant, staff members.

25 Q Who is the investigator?

1 BY MS. MELL:

2 Q How do you accuse GEO of understaffing a facility unless
3 you know what the staffing requires?

4 A We haven't accused of GEO of understaffing a facility.
5 We accused GEO of not paying the staff that it has
6 chosen to employ the rate that's required by law.

7 Q I thought I understood that you said Attorney General
8 Ferguson has an interest in having Washington citizens
9 do the jobs needed to operate the facility.

10 A No. I've said that Attorney General Ferguson, through
11 the Office of the Attorney General in the civil rights
12 unit, has a position that the jobs being done by
13 detainee workers in the facility is work that's
14 compensable to employees under Washington law. The
15 position is not that it should be detainees or that it
16 should not be non-detainees doing the work. We don't
17 have a position on that. The position is the people who
18 do the work in the facility, whoever they are, need to
19 be paid minimum wage for that work.

20 Q Okay. But does Attorney General Ferguson have a basis
21 for saying that any number of Washington citizens should
22 be doing the work in the facility?

23 A No, because we don't think that it has to be Washington
24 citizens.

25 Q And the Attorney General Ferguson is not taking a